

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

**IN RE: JOHNSON & JOHNSON
TALCUM POWDER PRODUCTS
MARKETING, SALES
PRACTICES, AND PRODUCTS
LIABILITY LITIGATION**

MDL NO. 16-2738 (FLW) (LHG)

***THIS DOCUMENT
RELATES TO ALL CASES***

CERTIFICATION OF P. LEIGH O'DELL, ESQ.

P. Leigh O'Dell, Esq., hereby certifies as follows:

1. I am an attorney at law and member of the law firm of Beasley, Allen, Crow, Methvin, Portis & Miles, P.C. I was appointed as Plaintiffs' Co-Lead Counsel to represent all Plaintiffs in the above-captioned matter.
2. I submit this Certification based on personal knowledge in support of the Plaintiffs' Steering Committee's Motion to Exclude the Opinions of Cheryl Saenz, M.D. and Kevin Holcomb, M.D. FACOG.
3. Attached hereto as Exhibit A is a true and correct copy of the Deposition of Cheryl Saenz, M.D., dated March 13, 2019.
4. Attached hereto as Exhibit B is a true and correct copy of the Expert Report of Cheryl Saenz, M.D., dated February 25, 2019.

5. Attached hereto as Exhibit C is a true and correct copy of the Deposition of Kevin Holcomb, M.D., FACOG, dated March 27, 2019.
6. Attached hereto as Exhibit D is a true and correct copy of the Expert Report of Kevin Holcomb, M.D., FACOG, dated February 25, 2019.
7. Attached hereto as Exhibit E is a true and correct copy of Exhibit 17 from the Deposition of Kevin Holcomb, M.D., FACOG.
9. Attached hereto as Exhibit F is a true and correct copy of the Expert Report of Rebecca Smith-Bindman, M.D., dated November 15, 2018.
10. Attached hereto as Exhibit G is a true and correct copy of the Deposition of Rebecca Smith-Bindman, M.D., dated February 7, 2019.
11. Attached hereto as Exhibit H is a true and correct copy of Schildkraut et al., *Association between Body Powder Use and Ovarian Cancer: The African American Cancer Epidemiology Study (AACES)*, *Cancer Epidemiol Biomarkers Prev*; 2016; 25(10);1411–7.
12. Attached hereto as Exhibit I is a true and correct copy of Penninkilampi and Eslick, *Perineal Talc Use and Ovarian Cancer, A Systematic Review and Meta-Analysis*, *Epidemiology*, 2018;29:41–49.
13. Attached hereto as Exhibit J is a true and correct copy of April 1, 2014 FDA letter.

14. Attached hereto as Exhibit K is a true and correct copy of Health Canada, Environment and Climate Change Canada, “Draft Screening Assessment Talc.” Dec. 2018.

15. Attached hereto as Exhibit L is a true and correct copy of Sjosten et al., *Retrograde Migration of Glove Powder in the Human Female Genital Tract*, Human Reproduction, 2004;19(4):991-995.

16. Attached hereto as Exhibit M is a true and correct copy of Kunz et al., *The Uterine Peristaltic Pump, Normal and Impeded Sperm Transport within the Female Genital Tract*, Plenum Press, New York, 1997.

17. Attached hereto as Exhibit N is a true and correct copy of Zervomanolakis et al., *Physiology of Upward Transport in the Human Female Genital Tract*, Ann NY Acad Sci, 2007;1101:1-20.

18. Attached hereto as Exhibit O is a true and correct copy of Buz’Zard and Lau, *Pycnogenol Reduces Talc-Induced Neoplastic Transformation in Human Ovarian Cell Cultures*, Phytother Res, 2007;21:579–586.

19. Attached hereto as Exhibit P is a true and correct copy of Shukla et al., *Alterations in Gene Expression in Human Mesothelial Cells Correlate with Mineral Pathogenicity*, Am J Respir Cell Mol Biol, 2009;41:114-123.

20. I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I may be subject to punishment.

/s/ P. Leigh O'Dell
P. Leigh O'Dell

Dated: May 7, 2019